

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

_____	)	
UNITED STATES OF AMERICA,	)	
	)	
v.	)	No. 15-cr-10127-MLW
	)	
TIMOTHY R. FLAHERTY,	)	
Defendant.	)	
_____	)	

**UNOPPOSED MOTION FOR LEAVE TO EXCEED TWENTY PAGE LIMIT**

Pursuant to L.R. 7.1(b)(4), the Defendant, Timothy R. Flaherty (“Flaherty”), requests leave to exceed the twenty page limit in his *Supplement Motion for Discovery and Incorporated Memorandum of Law* by ten pages. As grounds therefor, Flaherty states that the issues raised in his motion are complex and contain arguments not typically raised in discovery motions. Flaherty states that the first six-plus pages of his motion contain discovery requests that would be part of a separate motion if the memorandum were not incorporated.

**LOCAL RULE 7.1(A)(2) STATEMENT**

Counsel has conferred with the Government and they do not oppose the relief requested herein.

WHEREFORE, Flaherty requests that the Court allow his motion.

Respectfully Submitted  
TIMOTHY R. FLAHERTY  
By his attorneys,

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Date: July 24, 2015

**Certificate of Service**

I, Martin G. Weinberg, hereby certify that on this date, July 24, 2015, a copy of the forgoing document has been served via CM/ECF Electronic Filing, upon Assistant U.S. Attorney Robert Fisher and all other counsel of record.

/s/ Martin G. Weinberg  
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